




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 21 2000

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Beede Waste Oil Superfund Site (Plaistow, NH)

FROM: Bruce K. Means, Chair 
National Remedy Review Board

TO: Patricia L. Meaney, Director
Office of Site Remediation and Restoration
EPA Region 1

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed Superfund cleanup action for the Beede Waste Oil site in Plaistow, NH. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

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Generally, the NRRB makes “advisory recommendations” to the appropriate regional decision maker. The region will then include these recommendations in the Administrative Record for the site before it issues the proposed response action for public comment. While the region is expected to give the board’s recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency’s current delegations or alter in any way the public’s role in site decisions.

Overview of the Proposed Action

EPA Region 1 proposes to perform “Source Control” and “Management of Migration” remedial actions for the Beede Waste Oil Superfund Site. Source Control actions would involve excavation and off-site disposal/treatment of approximately 40,000 yds. of surficial soil (0 to 10 ft.) contaminated primarily with poly-chlorinated biphenyls (PCBs) and lead. This volume would include several large soil piles, material from a solid waste disposal area and in addition, about 1,500 yds. of contaminated sediment from adjacent Kelley Brook. Soil deeper than 10 ft. would be treated by thermally-enhanced vacuum extraction to remove volatile organic compounds (VOCs), which are an ongoing source of groundwater contamination. The VOCs are associated with a smear zone which will remain following the conclusion of an ongoing removal of mobile non-aqueous phase liquids (NAPL) from the water table. Management of Migration actions would involve installation of a groundwater pump and treat system designed for VOC and metals removal. The system would include seven extraction wells with a combined maximum flow rate of 200 gpm. Treated effluent would be recharged on-site upgradient of the plume through several large infiltration basins or discharged directly to Kelley Brook, if surface water quality standards can be attained. It is estimated that soil remedial action objectives would be attained in three to five years and groundwater remedial action objectives in 15 years.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for this proposal and discussed related issues on November 14, 2000, with EPA site manager Jim DiLorenzo, and New Hampshire Department of Environmental Services representatives Richard Pease and Robert Minicucci. Based on this review and discussion the board offers the following comments:

- The ARARs table provided in the site package was over-inclusive and was not alternative-specific. The board understands that the ARARs analysis presented in this package is preliminary and has not been fully reviewed by the region/state. The board questions the applicability (and/or inclusion) of some of the ARARs and TBCs (e.g., MCLGs are not consistent with stated remediation goals) and was not able to evaluate the ARARs accurately. The board encourages the region/state to continue their process of ARAR determination and include the appropriate ARARs analysis in the site decision documents.
- The region/state proposes to use a visual standard to define (and address) a significant sediment contamination source in nearby Kelley Brook. However, the package was unclear about which contaminants and levels drive the need for action, or how they relate to the visual standard. The board recommends that the site decision documents

clearly present both the bases for action in this area and the appropriate remediation goals that will ensure an acceptable residual risk for the Kelly Brook sediments.

- Based on the site review package, the preferred alternative relies on Monitored Natural Attenuation (MNA) to address the distillation source plume, the SWRP1 source plume, and a portion of the UST/AST/SWRP2 plume. However, the package does not provide a clear rationale to support use of MNA to address these plumes. For all areas where MNA is proposed, the region/state should clearly describe the extent and stability of the plumes as well as the contaminant degradation and rate mechanisms expected consistent with OSWER Directive 9200.4-17, "Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites" (12/1/97). In addition, the method for evaluating MNA effectiveness should be described in the decision documents (e.g., an appropriate monitoring plan which would include consideration of partial breakdown products, appropriate remediation goals, and a discussion of reasonable time frames, etc.).
- The board notes that the region/state have used background concentrations for setting selected remediation goals (e.g., As and Cr). However, it is unclear how these levels were determined and whether these levels are sufficiently distinguishable to avoid excavating non-contaminated soils. The Board recommends that the region/state review the remedial goals based on background concentrations and adjust those goals accordingly to avoid unnecessary cleanup costs.
- The board notes that the OSWER "Guidance on Remedial Actions for Superfund Sites with PCB Contamination" (EPA/540/G-90/007, August 1990) identifies a preliminary remediation goal of 1 ppm for residential cleanups, and that this level has been used as a final remediation level for many residential properties addressed under CERCLA. In this case, the region/state are proposing a cleanup level of 0.5 ppm PCBs. Based on the information provided in the package, the rationale for this level is unclear. The board recommends that the region/state provide a clear explanation and rationale for its proposed cleanup level along with references to the appropriate guidances in the site decision documents.

The NRRB appreciates the region's efforts to work closely with the state, potentially responsible parties, and community groups at this site. We encourage Region 1 management and staff to work with their regional NRRB representative and the Region 1/9 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate follow-up actions.

Thank you for your support and the support of your staff in preparing for this review. Please give me a call at 703-603-8815 should you have any questions.

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